20IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

KTM AG,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO,

Defendants.

Case No. 21-cv-1279

Judge Robert M. Dow, Jr.

REVISED PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on KTM AG's Motion for a Preliminary

Injunction, and this Court having considered the evidence before it hereby GRANTS Plaintiff's

Motion for Entry of a Preliminary Injunction in its entirety against the Defendants identified in

Amended Schedule A attached hereto (collectively, the "Defendants").

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing and/or counterfeit versions of Plaintiff's KTM and DUKE Trademarks (the "Counterfeit KTM Products").

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this

litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's previously granted Motion for a Temporary Restraining Order establishes that Plaintiff has a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiff has made a *prima facie* showing of trademark infringement because (1) the KTM and DUKE Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register as U.S. Trademark Registration Nos. 3,606,168; 3,547,084; 3,440,999 and 3,436,150 for the KTM Trademark and Registration No. 4,650,809 for the DUKE Trademark, (2) Defendants are not licensed or authorized to use the KTM or DUKE Trademark, and (3) Defendants' use of the KTM and DUKE Trademarks are causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with KTM AG. Furthermore, Defendants' continued and unauthorized use of the KTM and DUKE Trademarks irreparably harms Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions.

Accordingly, this Court ORDERS that:

1. Defendants, their officers, agents, servants, employees, attorneys and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:

- a. using Plaintiff's KTM and DUKE Trademarks or any confusingly similar trademarks or names in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine KTM Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's KTM and DUKE Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine KTM Product or other product produced by Plaintiff, that is not Plaintiff's or is not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's KTM and DUKE Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. further infringing Plaintiff's KTM and DUKE Trademarks and damaging Plaintiff's goodwill;
- e. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's KTM and DUKE Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof;

- f. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or any other domain name or online marketplace account that is being used to sell Counterfeit KTM Products; and
- g. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing Plaintiff's KTM and DUKE Trademarks or any confusingly similar reproduction, counterfeit copy or colorable imitation thereof that is not a genuine KTM Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's KTM and DUKE Trademarks.
- 2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that it owns and/or operate (c) their financial accounts, including all Amazon.com, Inc. ("Amazon") accounts, and (d) the steps taken by that Defendant to comply with paragraph 1, a through g, above.
- 3. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within three (3) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at Plaintiff's choosing:
 - a. unlock and change the registrar of record for the Defendant Domain Names
 to a registrar of Plaintiff's selection until further ordered by this Court, and

- the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court; or
- b. disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.
- 4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, Amazon, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within five (5) business days of receipt of this Order:
 - a. disable and cease providing services for any accounts through which
 Defendants engage in the sale of counterfeit and infringing goods using the
 KTM and DUKE Trademarks, including any accounts associated with the
 Defendants listed in Amended Schedule A;
 - b. disable and cease displaying any advertisements used by or associated with
 Defendants in connection with the sale of counterfeit and infringing goods
 using the KTM and DUKE Trademarks; and
 - c. take all steps necessary to prevent links to the Defendant Domain Names identified in Amended Schedule A from displaying in search results. This includes, but is not limited to, removing links to the Defendant Domain Names from any search index.
- 5. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' websites at the

Defendant Domain Names or other websites operated by Defendants, including, without limitation, any online marketplace platforms such as iOffer, Amazon, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web designers, sponsored search engine or ad-word providers, banks, merchant account providers, including Amazon, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. The identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;
- b. The nature of Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplace Accounts and Defendant Domain Names;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. The Defendant Domain Names or any domain name registered by Defendants; and
- e. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting

in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, Amazon, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

- 6. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 7. Amazon shall, within five (5) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
 - a. Locate all accounts and funds connected to Defendants, Defendants' Online
 Marketplace Accounts or Defendants' websites, including, but not limited to, any
 Amazon accounts connected to the information listed in Amended Schedule A hereto;

 and
 - b. Restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 8. Plaintiff may provide notice of these proceedings to Defendants, including notice of any future hearings and service of process pursuant to Fed.R.Civ.P. 4(f)(3), by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Defendant Domain Names are transferred to Plaintiff's control will redirect, or by sending an e-mail to the e-mail addresses identified in Amended Schedule A hereto; and any e-mail addresses provided for Defendants by third parties accompanied by a link to the website where the above-identified documents are located.

The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

- 9. Plaintiff's Amended Schedule A to the Complaint and the TRO is unsealed.
- 10. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.
- 11. Amazon.com, Inc. ("Amazon") shall maintain a restraint of FIVE THOUSAND DOLLARS (\$5,000) of funds in the Amazon seller accounts for each of Defendants No. 1 "Cooltoys Sales", No. 2 "Corrida", No. 70 "DEEPSOUND", No. 75 "Disenparts", No. 84 "eStarpro", No. 102 "Goodicare", No. 103 "Googas", No. 112 "Hale Dillion", No. 115 "HARVEST INN" and No. 140 "JEM&JULES" until final disposition of this case, or until further order of the Court. All other funds in the Amazon seller accounts for Defendants No. 1 "Cooltoys Sales", No. 2 "Corrida", No. 70 "DEEPSOUND", No. 75 "Disenparts", No. 84 "eStarpro", No. 102 "Goodicare", No. 103 "Googas", No. 112 "Hale Dillion", No. 115 "HARVEST INN" and No. 140 "JEM&JULES" shall be released upon expiration of the Temporary Restraining Order on May 26, 2021. "Any restraints on the accounts of Defendants No. 1 "Cooltoys Sales", No. 2 "Corrida", No. 70 "DEEPSOUND", No. 75 "Disenparts", No. 84 "eStarpro", No. 102 "Goodicare", No. 103 "Googas", No. 112 "Hale Dillion", No. 115 "HARVEST INN" and No. 140 "JEM&JULES", except for an asset restraint of \$5,000, shall be lifted upon expiration of the Temporary Restraining Order on May 26, 2021."

Dated: May 20, 2021

Honorable Robert M. Doy Jr.
U.S. District Judge

AMENDED SCHEDULE A

No.	Defendant Name / Alias
3	abaowus
4	abinge
5	ABITGOK38X7GL
6	AH parts
7	AiCooler
8	aijolenlon
9	AJUAN
10	Amarzon-Automotive Parts
11	AmiAbi
12	AMSAMOTION
13	ANGEL QUEEN CHAIRS.
14	ANGLEWIDE
15	Aniro Moto
16	Anna Marvin
17	Anngo
18	ANPART
19	antgroup
20	Aosiyp-u
21	AQIMY
22	Artudatech
23	Autones
24	autoslegend
25	AUTOVIC
26	bajuys
27	BaLa AUTO79
28	Baoblaze
29	BCtimingparts
30	besttopstar
31	betterman
32	BIASTNR
33	Bid4ze-motor
34	BiuZi
35	BL-ROSES™
36	BlueStars Diesel
37	Bracon
38	Brotech
39	BSCstore
40	Burappoi dy

41	Calpalmy
42	CAOWEIUS
43	Car Motor Led Parts
44	Carbour
45	CCIYU
46	Cell Phones Parts
47	Chanmeen
48	CHENDGE2
49	
	chengchengh Charmy Floatronics
50	CherryElectronics CHSXLL
51	
52	chuanyanbaihuoshangdian
53	chunxiangbaihuo
54	cjr-segsegf8
55	CNBK
56	CoCostore
57	conlense
58	Conniecony
59	Coolboyer
60	cqshongyushangmao
61	CS266
62	CSI Auto Parts
63	CTCAUTO
64	Cusco
65	Cynemo
66	CZWShop
67	Dannisly
68	Dealauto
69	deepocean
71	Delivery time 7-15
72	DENGZHOUSHIQIANYIBAISHUNFUZHUANGXIAOSHOUBU
73	DIKAER Direct
74	DirtBikeClub
76	DON-BRO
77	DRQ ONLINE
78	Dru-us
79	Drwcotu
80	Dubi Auto store
81	Earlyred
82	EASTAR
83	Eastbuy

85	EVANST
86	EWEIN
87	Fang.kaw320
88	FangFang-Home
89	fanglanbaihuodian
90	Felix Box
91	FINCOS
92	FINDAUTO
93	FLFLFF
94	Freesol
95	Frezon-US
96	fuyangshiliguolindouzhipinyouxiangongsi
97	Ganyang 216
98	Gardenparts
99	gdusseller
100	GGHUK-IT
101	Gobanana
104	Goolily
105	Gorgeriie
106	Green-L LED Lighting
107	Grumpy sister
108	Guangzhou Aichezu Technology Co., Ltd.
109	guangzhoushibaiyunqutianxueyiyuanguanliyouxiangong
110	GUOLI1
111	Haigongheng Industrial
113	hangeparts
114	Haotang Auto Parts
116	He Nan Jin You
117	HED-US
118	HEIYEli
119	Henan Duochuan Trading Company
120	HengShengXin
121	HENGXIANGPARTS
122	heqinghone
123	HerisDirect
124	HICOC
125	HighendDealUS
126	HIYOYO
127	НКОО
128	Hlyjoonly
129	HONGSONGPINGFE

130	Hot Light Team
131	HTQZW
132	HUA KUN MAO YI
133	HuihuangAMZus
134	huihuishangqu
135	IM Billionaire
136	IM VERA
137	Ineedup
138	JahyShow
139	Jannhuand215
141	JIANFEI US
142	JiaoZhouShiJinKunZhuoRiYongBaiHuoDian
143	JiNanBiShengGuangGaoYouXianGongSi
144	JINGJIABAIHUO
145	jingyangshangmao
146	JOAUTOPARTS
147	Jonathan Shop

N	Defendants Online Marketplace
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	marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A3EVOAHCN O8ILN&sshmPath=
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7	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA=&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A31TAOSC2UT4A0&sshmPath=
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9	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA=&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A1MDCSOP6OAIMT&sshmPath=

- 1 https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA=&
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